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April 27, 1998

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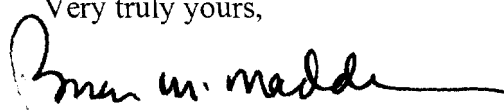
Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street
Washington, DC 20554

Dear Ms. Salas:

On behalf of ECI License Company, L.P., there is transmitted herewith an original and four copies of its Comments with respect to the Petition for Rule Making filed by Nickolaus E. Leggett, *et al.* (RM No.-9208).

If any additional information is desired in connection with matter, please contact the undersigned counsel.

Very truly yours,



Brian M. Madden

BMM/tlm
Enclosure

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)
) RM-9208
Microstation Radio Broadcast Service)
Petition for Rulemaking)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

COMMENTS

ECI License Company, L.P. ("ECI") hereby submits its comments in response to the above-captioned Petition for Rulemaking filed on behalf of Nickolaus E. and Judith F. Leggett ("Petitioners"). Petitioners propose a "microstation" radio broadcasting service for the purpose of providing "very localized and/or specialized broadcast service to the public." ECI strongly opposes this proposal, which will not provide the supposed benefits imagined by its proponents, but may very well undermine the service now provided by established broadcasters, while at the same time creating vast new potential for interference that the FCC is not likely to be in a position to monitor or control.

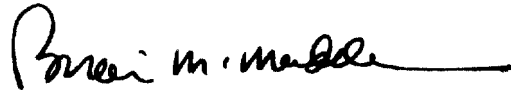
First, although the petitioners are well-intentioned in their desire to offer new opportunities for broadcast service to niche audiences, adoption of the proposed rule changes would likely have a negative impact on service to these communities. For example, by fragmenting the financial support necessary to keep current full-power radio

broadcast stations on the air, these new microstations would undermine the present support for stations serving minority communities in urban areas. As the Commission and the industry learned from the experience in Docket No. 80-90, a plethora of new radio stations does not necessarily yield enhanced diversity, but inevitably threatens the financial base of support for all stations. Thus, the ultimate effect of adoption of Petitioners' proposal would likely be a reduction in the programs available to minority and other niche audiences that currently receive significant service from traditional broadcasters.

Second, the addition of many new low power stations would result in a substantial increase in destructive interference, especially in the FM band — producing an effect like that previously experienced through the “shoe-horning” of stations in the AM band. In the present climate of reduced enforcement resources for the FCC, this could have a catastrophic impact because the agency, already forced to curtail field inspections and other oversight activities, may well be left unable to adequately police the activities of hundreds of new microbroadcasters.

For the foregoing reasons, ECI urges the Commission not to adopt new microradio allocations as proposed by the petitioners.

ECI LICENSE COMPANY, L.P.

By: 

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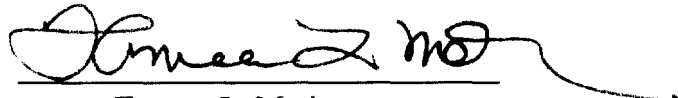
April 27, 1998

Its Attorneys

CERTIFICATE OF SERVICE

I, Tamara L. Mariner hereby certify that a complete copy of the foregoing
Comments of ECI Company, L.P. was sent this 27th day of April, 1998 by first-class United
States mail, postage prepaid to:

Nickolaus E. Leggett
1432 Northgate Square
#2A
Reston, Virginia 20190-3748



Tamara L. Mariner

*Via Hand Delivery